

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE LASTPASS DATA SECURITY INCIDENT
LITIGATION

CIVIL ACTION No. 1:22-CV-12047-PBS

**PLAINTIFFS' UNOPPOSED MOTION PURSUANT TO LOCAL RULE 7.2(c) FOR
LEAVE TO FILE AMENDED COMPLAINT UNDER SEAL AND TO BRIEFLY
EXTEND TIME TO FILE COMPLAINT**

Plaintiffs, pursuant to local rule 7.2, hereby move and respectfully request that the Court grant them leave to file their Amended Complaint (the “Complaint”) in this action under seal, in order to make unavailable for public inspection the portions of the factual allegations in the Complaint that provide details of the losses sustained by some Plaintiffs following the data breach. Plaintiffs’ Consolidated Complaint includes specific allegations regarding the nature of certain losses that Plaintiffs allege is reasonably related to the data breach. Making this information public would further expose Plaintiffs to the possibility of additional fraud, or make it more likely that they become targets of additional cyber-attacks, if not both. This is particularly a concern when sensitive information is included in a Complaint and located in a single place with other confidential information. *See Oneamerica Fin. Partners, Inc. v. T-Sys. N. Am., Inc.*, No. 115CV01534TWPKL, 2016 WL 891349, at *5 (S.D. Ind. Mar. 9, 2016) (“[T]he Court is persuaded by the assertion that the risk would be heightened because information a hacker would otherwise have to spend time and effort to obtain is ‘provide[d] in a single source information.’”) (quoting plaintiff’s motion to seal). Plaintiffs thus have good cause to believe that impoundment of small portions of the factual allegations in the Complaint is necessary to protect Plaintiffs from additional losses due to the data breach.

Accordingly, Plaintiffs move that the Court enter an Order granting them leave to file the Complaint under seal. Plaintiffs request that the Order also provide that the Plaintiffs would, within three days of the filing of the Complaint under seal, publicly file a redacted copy of the Complaint, redacting only the specific information regarding the losses sustained by of some of the Plaintiffs as described above.

Plaintiffs' Complaint is due to be filed today, July 17, 2023. Accordingly, if the Court cannot decide this motion to seal on July 17, 2023, Plaintiffs respectfully move that the Court extend their deadline for filing the Complaint until two days after the Court rules on this motion to seal.

Plaintiffs' counsel have consulted with counsel for the Defendants in this action and they have advised Plaintiffs' counsel that they do not oppose the Court's allowance of this motion.

Date: July 17, 2023

Respectfully Submitted,

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LOCAL RULE 7.1(a)(2) CERTIFICATION

Undersigned counsel hereby certify that they have conferred with counsel for Defendants, who advised that they do not oppose this motion.

Dated: July 17, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of July 2023, I caused a true and correct copy of the foregoing Unopposed Motion to Impound to be served upon all counsel of record via this Court's CM/ECF system.

/s/ Edward F. Haber
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